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July 19, 2023

VIA ECF

Honorable Eric N. Vitaliano
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lochnicki, *et al.* v. Planned Building Services, Inc., *et al.*
Civil Action No.: 23-cv-02822

Dear Judge Vitaliano:

We represent all Defendants in the above-referenced matter. Pursuant to Your Honor's July 6, 2023 Order, and after conferring with Plaintiff, we write to propose a briefing schedule for Defendants' anticipated Motion to Dismiss.

Opening Brief:	August 11, 2023
Opposition:	September 1, 2023
Reply:	September 15, 2023

Please let us know if this schedule is acceptable to the Court. If Your Honor has any questions or concerns, we are available at the Court's convenience.

Respectfully submitted,
FOX ROTHSCHILD LLP
/s/ Glenn S. Grindlinger
Glenn S. Grindlinger

cc: All counsel of record via ECF

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